

Att #2

U.S. Department of
Homeland Security

United States
Coast Guard



Commandant
United States Coast Guard

2100 Second Street, SW STOP 7581
Washington, DC 20593-7581
Staff Symbol: CG-5434
Phone: (202) 372-2357
FAX: (202) 372-1918

16721

SEP 27 2011

From: E. P. CHRISTENSEN, CAPT
COMDT (CG-543)

CG-543 Policy Letter
No. 11-12

To: Distribution

Subj: SEA SERVICE ON VESSELS MEASURED UNDER BOTH THE REGULATORY
MEASUREMENT SYSTEM AND CONVENTION MEASUREMENT SYSTEM

Ref: (a) National Maritime Center Policy Letter 15-02, *Sea Service on Vessels Measured Under the International Tonnage Convention System (ITC)*
(b) 46 U.S.C.A. §7506
(c) 46 CFR Part 11
(d) Navigation and Vessel Inspection Circular (NVIC) 11-93, as amended, *Applicability of Tonnage Measurement Systems to U.S. Flag Vessels*

1. PURPOSE. To provide guidance on acceptance of sea service from mariners serving on vessels that are measured under both the regulatory measurement system and the convention measurement system when applying for merchant mariner credentials.

2. BACKGROUND.

a. The convention measurement system is a U.S. tonnage measurement system that is based on and complies with the requirements of the International Convention on Tonnage Measurement of Ships, 1969 (ITC). Gross tonnages assigned under this system are referred to in terms of gross tonnage, ITC (GT ITC) or gross tonnage (GT). The regulatory measurement system is a U.S. tonnage measurement system that expresses gross tonnages assigned under that system as gross register tons (GRT).

b. The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) has tonnage thresholds expressed using GT per the requirements of the ITC while the Coast Guard's credentialing regulations are expressed in GRT under the regulatory measurement system. The ITC generally results in higher values than the regulatory measurement system, and in certain cases, a vessel's tonnage may be below a threshold when GRT is used, but above it when GT is used. There is no conversion factor between GRT and GT.

c. Previous policy provided that mariners would be credited with the tonnage that corresponds to the trade the vessel was engaged in at the time the service was acquired. For example, on a vessel that measures 375 GRT and 3,300 GT, the mariner would be credited with service on a vessel of 375 GRT on domestic voyages where the GRT is

Subj: SEA SERVICE ON VESSELS MEASURED UNDER BOTH THE REGULATORY MEASUREMENT SYSTEM AND CONVENTION MEASUREMENT SYSTEM

used, and would only be credited with the vessel's higher GT if the vessel were engaged on an international voyage where the GT applied.

3. DIRECTIVES AFFECTED. National Maritime Center Policy Letter 15-02 is superseded and cancelled by this policy letter.

4. DISCUSSION. The previous policy requires clarification to better assist mariners seeking to upgrade their credentials.

a. Mariners holding officer endorsements limited to not more than 1,600 GRT will have their officer endorsements note both the regulatory tonnage and the ITC tonnage. Mariners holding officer endorsements with tonnage restrictions calculated in accordance with 46 CFR 11.402 will have the restriction calculated using both the regulatory tonnage and ITC tonnage using the equivalents in subparagraph c. below. Title 46 CFR 11.402(b) provides the following:

i. The endorsement is limited to the maximum tonnage on which at least 25 percent of the required experience was obtained, or 150 percent of the maximum tonnage on which at least 50 percent of the service was obtained, whichever is higher. Limitations are in multiples of 1000 gross tons, using the next higher figure when an intermediate tonnage is calculated. When the calculated limitation equals or exceeds 10,000 gross tons, the applicant is issued an unlimited tonnage endorsement.

ii. All tonnage limitations are removed when the applicant has six months of service on vessels of over 1600 gross tons in the highest grade endorsed. For other situations regarding the removal of the tonnage restriction, see 46 CFR 11.402(c).

b. When evaluating sea service on vessels measured under both regulatory and convention measurement systems, mariners may be credited with the ITC tonnage regardless of the nature of the voyages the vessel was engaged upon. Service will be credited under the ITC tonnage if the mariner submits service letters or other documentation that the vessel(s) served on were operated in accordance with the manning requirements applicable to the higher ITC tonnage at all times noted in the service letter or documentation.

c. In applying 46 CFR 11.402(a) when evaluating sea service, service on vessels of less than 3,000 GT will be considered equivalent to service on vessels less than 1,600 GRT for qualification for a license valid for any gross tons. Service on a vessel of 500 GT or less shall be considered equivalent to service on a vessel of 200 GRT or less.

d. If a mariner qualifies for a license for any gross tons with a tonnage limitation under 46 CFR 11.402, their license shall not be limited to less than 2,000 GRT or 4,000 GT.

5. ACTION.

a. The National Maritime Center (NMC) shall follow the guidance in this policy letter.

Subj: SEA SERVICE ON VESSELS MEASURED UNDER BOTH THE REGULATORY
MEASUREMENT SYSTEM AND CONVENTION MEASUREMENT SYSTEM

b. Commanding Officers of units with marine safety responsibilities should bring this policy letter to the attention of the maritime industry in their area of responsibility.

c. This policy is posted along with other CG-543 policy letters on the Coast Guard's Homeport internet website at <http://homeport.uscg.mil> by selecting the following links: Library > Policy > Policy Letters > Inspection.

6. DISCLAIMER.

This document is intended to provide operational requirements for Coast Guard personnel and is not intended to nor does it impose legally-binding requirements on any party outside the Coast Guard.

#

Distribution: All Area/District (p) offices
All Sectors/Activities and MSUs
National Maritime Center
Marine Safety Center

NATIONAL MASTER OF SELF-PROPELLED VESSELS LESS THAN 500/1600 GRT UPON OCEANS OR NEAR COASTAL WATERS § 11.412 & 11.418

NAME: _____ REFERENCE #: _____ DATE: _____

General Requirements	Reference: 46 CFR	✓
Must have US Citizenship.	10.221	
Must be at least Age 21.	11.201	
Medical Certificate Requirements: <ul style="list-style-type: none"> • Original - Must hold or be approved for Medical Certificate. • Renewal, ROG, New Endorsement - Must hold an unexpired Medical Certificate or submit a Medical Certificate application. 	10.301/10.302	
Must be Drug Testing Compliant.		
Mariner Fees must be paid.	10.219	
Sea Service Requirements	Reference: 46 CFR	
Recency – 90 days in the past 3 years on vessels of 50 GRT for Master 500 GRT and vessels of 100 GRT for Master 1600 GRT. Engine Department experience on vessels of the appropriate tonnage may be used for recency..	11.201 11.410	
MASTER LESS THAN 1600	46 CFR	
1440 total days of service, in any position or department, on Ocean, Near Coastal or Great Lakes waters, OF WHICH <ol style="list-style-type: none"> 1. Service on inland waters, other than GL, may substitute for up to 720 days of the total required service., AND 2. 720 days of service on vessels of more than 100 GRT, AND 3. 720 days of service MUST have been as a master, mate; master or mate (pilot) of towing vessels, or equivalent position while holding an endorsement as master, mate, master or mate (pilot) of towing vessels, AND 4. 360 days of the service as master, mate, or equivalent position, must have been on vessels of more than 100 GRT; OR 	11.412	
360 days of service as master/mate or master/mate T/V's on Ocean or Near Coastal waters on vessels of more than 100 GRT while holding a license or MMC as mate less than 1600 GRT OC or master/ mate T/V's.	11.412	
Mariner holding an endorsement as Chief Mate Oceans/NC self-propelled vessels 1,600 GRT or more is eligible for this endorsement without further exam.	11.412	
2 nd Mate Oceans/NC of 1600 GRT or more is eligible for this endorsement upon completion of a limited examination.	11.412	
Chief Mate NC or Oceans of Unlimited Tonnage is eligible for this endorsement without service or examination.		

MASTER LESS THAN 500		46 CFR	
1080 days of service on Ocean, Near Coastal or Great Lakes waters, OF WHICH 1. Service on inland waters, other than GL, may substitute for up to 540 days of the total required service., AND 2. 720 days of service MUST have been as a master, mate, or equivalent position while holding an endorsement as master, mate, or operator of uninspected passenger vessels, AND 3. 360 days of the service as master, mate, or equivalent position, must have been on vessels over 50 GRT; OR		11.418	
360 days of service on Ocean or Near Coastal service on vessels more than 50 GRT as master, mate, master or mate of self-propelled or towing vessels while holding a license or MMC as mate less than 500 GRT OC, OR		11.418	
Hold a license or MMC as Master or Mate of towing vessels NC or OC, AND , provide 360 days of service as a Master or Mate of Ocean or N/C Towing Vessels AND completion of a limited examination (<i>Limited exam allowed for any Master of T/V with or without tonnage limitation</i>)		11.418	
NOTE: Any service towards an OC, NC or STCW 500/1600 endorsement will be credited as follows: 1. Service on GL will be credited day for day. 2. Service on inland waters, other than GL, may substitute for up to 50% of the total required service. 3. Service on vessels to which STCW applies will be credited day for day.		11.401	
Sail or Auxiliary Sail		46 CFR	
360 days on appropriately sized sail or auxiliary sail vessels, - Master Less than 500 GRT – All required service over 50 GRT - Master Less than 1600 GRT – All required service over 100 GRT, AND ,		11.401	
Complete CG exams or Approved course		11.201	
Other Requirements		46 CFR	
First Aid	(completed within 1 year) (original only)	11.201	
CPR	(must be valid) (original only)	11.201	
Approved Basic Fire Fighting Course within 5 years of application date (unless previously met) Valid STCW BT is acceptable.		11.201	
Advanced Fire Fighting Course within 5 years of application date (unless previously met) Valid STCW Advanced Firefighting is acceptable.		11.201	
EXAMS		46 CFR	
See Exam Guide			
Examination		11.201	
A person holding Master 1600 may qualify for an STCW endorsement, according to § 11.311.			
A person holding Master 500 may qualify for an STCW endorsement, according to § 11.309, 11.317, 11.319 and 11.321.			

Comments: